



William A. Lorenz, Jr., Esq.
716.286.5141
william.lorenz@muralaw.com

April 1, 2022

VIA PACER ONLY

Hon. Mark W. Pedersen
United States Magistrate Judge
Western District of New York

Re: *Santiago v. The City of Rochester, et al.*
Case No. : 6:14-cv-06719
Our File No. : 9824

Dear Judge Pedersen:

On behalf of plaintiff Carlos A. Santiago, and with the consent of counsel for the remaining defendants in this action, I respectfully request an extension of the discovery deadlines issued by the Court at the scheduling conference on July 22, 2021 (Docket 130). At that conference, the following deadlines were discussed:

- Fact discovery to end on November 19, 2021;
- Plaintiff to identify an expert by December 21, 2021; and
- Defendants to identify an expert by January 31, 2022.

My office was appointed *pro bono* counsel for the limited purpose of discovery on November 18, 2021 (Docket 136). Following our initial meeting with Mr. Santiago and review of this file, we learned that there was a pending motion for judgment on the pleadings by defendant County of Monroe, which Mr. Santiago opposed *pro se* on March 7, 2022 as my office was not retained for that motion (Docket 140). The Hon. Frank P. Geraci, Jr. decided that motion on March 23, 2022 (Docket 141).

Upon the consent of counsel for the remaining defendants, plaintiff respectfully requests the following enlargement of the discovery deadlines as follows:

- Fact discovery to end on August 19, 2022;
- Plaintiff to identify an expert by September 19, 2022; and
- Defendants to identify an expert by October 19, 2022.

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Alternatively, if the Court requires a scheduling conference with all parties before issuing a new scheduling order, plaintiff respectfully requests that conference be scheduled as soon as possible.

Respectfully submitted.,

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A handwritten signature in black ink that reads "William A. Lorenz, Jr." with a stylized flourish at the end.

William A. Lorenz, Jr.

WAL/me

cc: Counsel for defendants (via PACER)